

FACTS**WHAT DOES PONTO SOFTWARE, INC. DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the products or services you have with us. This information can include:

- Social Security number and checking account
- Income and payment history
- Investment experience and transaction history

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Ponto Software, Inc. chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Ponto Software, Inc. share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We Do Not Share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We Do Not Share
For our affiliates to market to you	No	We Do Not Share
For nonaffiliates to market to you	No	We Do Not Share

Questions?

Email support@ponto.org or mail Ponto Software, Inc., 155 Montgomery Street, Suite 700, San Francisco, CA 94104.

Who we are

Who is providing this notice?

Ponto Software, Inc. is providing this notice on behalf of Ponto Software Inc. and its affiliate Bridge Trust, Co.

What we do

How does Ponto Software, Inc. protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include systems, policies and procedures designed to protect your personal information physically, electronically and procedurally from being accessed by unauthorized persons.

How does Ponto Software, Inc. collect my personal information?

We collect your personal information, for example, when you

- Give us your contact information
- Provide account information
- Tell us who receives money or tell us where to send the money

We also collect your personal information from others, such as our affiliates or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choices will apply to everyone on your account - unless you tell us otherwise.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Bridge Trust, Co.
- Bridge Trading, GmbH
- Ponto UK Limited
- BFC Bridge Finance Canada, Inc.
- Bridge Swaps, Co.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Nonaffiliates we share with can include financial services companies and nonfinancial companies.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- We do not currently have any joint marketing partners.

Other important information

- **For California Customers:** Under California law, we will not share information we collect about you to nonaffiliates, unless the law allows. For example, we may share information with your consent, to service your accounts, or to as necessary to prevent fraud, or as otherwise authorized by California law. We will limit sharing among our affiliates to the extent required by California law. For additional choices, please refer to *Important Privacy Choices for Consumers* on the following page.

IMPORTANT PRIVACY CHOICES FOR CONSUMERS

As a California consumer, you have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices below.

Your Rights

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending you information about some other products or services.

Your Choices

Restrict Information Sharing With Companies We Own or Control (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies.

- NO, please do not share personal and financial information with your affiliated companies.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services to you.

- NO, please do not share personal and financial. Information with outside companies you contract with to provide financial products and services.

Time Sensitive Reply

You may make your privacy choice(s) at any time. Your choice(s) marked here will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

Name: _____

Account or Policy Number(s): _____

Signature: _____

To exercise your choices do one of the following:

- (1) Fill out, sign and send back this form to us (you may want to make a copy for your records);
- (2) Reply electronically by contacting us through the following Internet option: support@ponto.org.